# 10 FAM 560 MONITORING THE PROGRAM

(TL:PEC-01; 10-01-1999)

- a. Sections 560 and 570 comprise general Program and Grant Monitoring guidelines for the Bureau. While the same general principles of accountability and oversight apply, the focus of the activities is, for some Bureau offices or divisions, different. Program monitoring provides management and oversight to Bureau-identified categories of activity, and generally includes activities funded under a number of grants and/or cooperative agreements. Grant monitoring provides management and oversight of discrete fiscal instruments to outside cooperating institutions and grantee institutions.
- b. The general purpose of this directive is to improve the quality of program monitoring in the Bureau of Education and Cultural Affairs (ECA) through the establishment of standards for monitoring. These standards provide a common framework for all program offices to follow and represent minimum expectations. Program offices are encouraged to exceed these standards whenever possible, and to delineate additional, program-specific standards, as necessary.

## 10 FAM 561 GENERAL POLICY

(TL:PEC-01; 10-01-1999)

It is the policy of the Bureau to monitor the status and effectiveness of programs to provide reasonable assurance that federal funds are expended in ways that meet provisions of pertinent statutes, regulations and administrative requirements, and adequate progress is being made toward achieving program goals.

# 10 FAM 562 APPLICABILITY

(TL:PEC-01; 10-01-1999)

All offices which administer programs for the Bureau are subject to the terms of these guidelines. Exemption from any provision may be requested with justifications by the cognizant Office Director and must be approved by the Assistant Secretary or the Deputy Assistant Secretary.

## 10 FAM 563 ACTIVITIES

# 10 FAM 563.1 Monitoring

(TL:PEC-01; 10-01-1999)

- a. Monitoring is the observation of, analysis of, or assistance to a program to determine and improve:
- (1) Compliance with statutes, regulations, and terms and conditions of award; and
- (2) Quality and the accomplishment of stated goals and objectives of the program.
- b. Each program office is responsible for developing a plan which delineates how in a given fiscal year programs are to be monitored in accordance with the requirements set forth in this directive.

#### 10 FAM 563.2 Authorization

(TL:PEC-01; 10-01-1999)

Program activities must be consistent with and authorized by the Mutual Educational and Cultural Exchange Act, as amended, and must comply with the Bureau of Educational and Cultural Affairs' legislative charter.

# 10 FAM 564 ROLES AND RESPONSIBILITIES

## 10 FAM 564.1 Office Directors

(TL:PEC-01; 10-01-1999)

Responsible to:

- (1) Set guidelines for review and approve program monitoring guidelines.
- (2) Assure that monitoring functions are included in individual performance agreements, as appropriate.
- (3) Identify resources to be used for monitoring in conjunction with development of travel and other budgets.
- (4) Delineate monitoring responsibilities of managers and supervisors within the organization.

# 10 FAM 564.2 Managers, Program Officers

(TL:PEC-01; 10-01-1999)

Under the general supervision of the Office Director, managers:

- (1) Develop program monitoring plans.
- (2) Develop appropriate and systematic monitoring approaches, guidelines, and instruments.
  - (3) Maintain office grant files.
- (4) Monitor programs in accordance with monitoring plans and procedures, with assistance from the Grants Division on business and financial matters.
- (5) Advise program constituents on program progress; resolve problems or participate in the resolution of problems.
- (6) Establish internal procedures for tracking follow-up actions resulting from monitoring.
- (7) Review all programmatic reports concerning monitoring or which provide helpful input in the monitoring process, including any which contain recommendations to cooperating organizations and other Department offices concerned.
- (8) Review pertinent audit reports for monitoring implications in conjunction with the audit officers.
  - (9) Share documents and information, as appropriate.

## 10 FAM 564.3 Grants Division Staff

(TL:PEC-01; 10-01-1999)

The Grants Division Staff is responsible to:

- (1) Share documents and information with program staff as necessary or helpful to program monitoring.
  - (2) Maintain official grant files, if applicable.
- (3) In consultation with cognizant program staff, approve changes in negotiated scopes of activity, as monitoring results dictate.
  - (4) Monitor financial or business management aspects of programs.

(5) Assist in developing financial management aspects of annual monitoring plans and guidelines.

# 10 FAM 564.4 Inspector General

(TL:PEC-01; 10-01-1999)

The Inspector General is responsible to:

- (1) Assure appropriate handling and resolution of allegations of fraud, waste, and mismanagement disclosed through program monitoring.
- (2) Inform program offices of audit schedules and findings to assist program offices in developing annual monitoring plans.

# 10 FAM 564.5 Office of Legal Adviser

(TL:PEC-01; 10-01-1999)

The Office of the Legal Adviser is responsible to:

- (1) Provide assistance to program offices, as necessary, concerning legal issues raised in program monitoring guidelines, monitoring instruments, monitoring contacts, and monitoring findings.
- (2) Review for legal sufficiency and compliance with statutorily required procedures program guidelines and instruments that may interpret or apply statutes and regulations.

# 10 FAM 565 PURPOSE OF MONITORING

(TL:PEC-01; 10-01-1999)

- a. The purpose of program monitoring is to determine and improve compliance with statutes, regulations, and terms and conditions of any awards; and project quality and progress of a programs in meeting their stated Bureau goals in accordance with the terms and conditions set for them by the Bureau or other Department elements.
- b. More specifically, sufficient and systematic monitoring of programs is needed to make the following administrative determinations:
- (1) Compliance of grantees with award conditions, program regulations, and the authorizing program legislation;
- (2) Sufficient progress toward accomplishing stipulated and approved project and program goals;
- (3) Relative quality and cost effectiveness of the management of projects and programs;

- (4) Need for technical assistance to enhance project quality and compliance;
  - (5) Identification and dissemination of exemplary results.
- (6) Communication with field posts of information relevant to their esponsibilities.

# 10 FAM 566 TIMING/PLANNING OF MONITORING

# 10 FAM 566.1 Application Period

(TL:PEC-01; 10-01-1999)

The period for monitoring spans the time from the first day of the grant award including planning, recruitment, advertising and implementation of the program to the final day of the grant award. At a minimum, all program activities must be monitored by written evaluations, e-mail or telephone during the grant period, at least once a year for long term activities. Every grantee institution is required to submit a written final report. All program reports should include information about program activities and the achievements of individual participants.

# 10 FAM 566.2 Monitoring Plan

(TL:PEC-01; 10-01-1999)

Each program office should submit a plan for monitoring grant programs. The plan is designed to ensure that each program office develops monitoring activities that are consistent with statutory and office requirements and purposes. It should contain the following elements:

- (1) A summary of the monitoring activities to be carried out based on anticipated programs and resources. This summary should include an explanation of how monitoring priorities and methods were determined and an assurance that available data on programs have been considered in formulating the plan, and will be obtainable. The summary should provide information on the frequency, quantity, and purposes of monitoring being used, as well as who is to do the monitoring, i.e., staff or cooperating agencies.
- (2) Justification should be made for monitoring that involves use of travel funds. Trips should be ranked in priority order with proper justification. Criteria that may be used in selecting programs for on-site monitoring appear below. In using these criteria, program managers should decide which criteria are most relevant to their program mandate(s) and rank programs recommended for visits in priority order with appropriate justification.

- (3) A report of the progress made.
- (4) An analysis of any particular problems or opportunities that will require special attention and a description of relevant monitoring and assistance activities.
- (5) An explanation of anticipated monitoring costs, including travel and staffing.
- (6) A copy of any program guidelines and instruments being used in the monitoring process or a timetable indicating when they will be ready for review.

# 10 FAM 567 MONITORING APPROACHES AND ACTIVITIES

(TL:PEC-01; 10-01-1999)

All program offices should establish and maintain monitoring activities that are consistent with the statutory requirements and purposes of their authorizing legislation. These activities must include, at a minimum, systematic and appropriate contact with grantees, clearly understood operational guidelines, and procedures for staff, and, when appropriate, other activities that enhance the effectiveness of grantees' progress in meeting program goals.

## **10 FAM 567.1 Methods**

(TL:PEC-01; 10-01-1999)

- a. At least six methods can be used for monitoring:
- (1) Telephone conversations
- (2) Site visits
- (3) Review of reports
- (4) Meetings with grantees
- (5) Correspondence (written/electronic)
- b. Any substantive findings should be documented, followed up as necessary, and data made available for Bureau use, as appropriate.

### **10 FAM 567.2 Criteria**

(TL:PEC-01; 10-01-1999)

Offices should monitor grants to the maximum extent possible within existing resources. At a minimum, all grantees must be monitored by review of written program reports each year. Complex or vulnerable grants, or projects with special significance, however, will require additional monitoring attention.

## **10 FAM 567.2-1 Telephone Conversations**

(TL:PEC-01; 10-01-1999)

Each Program Officer should use telephone monitoring in accordance with the monitoring plan. Guidelines or instruments should be used to ensure adequate coverage of topics. Exclusive use of telephone monitoring may be appropriate for renewal projects or for projects that cannot readily be visited.

#### **10 FAM 567.2-2 Site Visits**

(TL:PEC-01; 10-01-1999)

Site visits, where time and fiscal resources permit, may be particularly appropriate for complex or troublesome projects or projects with special significance. Site visiting, however, should not be used as a substitute for other ongoing forms of monitoring. Each program monitoring manual should include guidelines for planning and conducting site visit, and for preparing follow-up reports. Prior to a site visit, the staff member to conduct the visit should discuss both the financial and programmatic concerns related to projects to be visited with the concerned program and grants officers.

# 10 FAM 567.2-3 Review of Reports

(TL:PEC-01; 10-01-1999)

To ensure the timely review of reports, each program office should establish procedures for tracking deadlines for submission, dates of review, and follow-up actions.

# 10 FAM 567.24 Meetings with Program Participants

(TL:PEC-01; 10-01-1999)

Local meetings where a number of program participants are in attendance, or meetings specifically for project directors/staff, provide an opportunity for monitoring. At these events, for example, staff members can make their program monitoring expectations clear, gather information on project

needs and progress, and hold networking sessions where participants and other experts assist one another in better meeting program goals.

## 10 FAM 567.2-5 Correspondence

(TL:PEC-01; 10-01-1999)

Correspondence, electronic or otherwise, may be used to obtain information, resolve problems, or to communicate program developments and goals.

# **10 FAM 567.3 Follow-up Procedures**

(TL:PEC-01; 10-01-1999)

- a. All monitoring contacts should be documented and retained in the program office file. Significant findings (e.g., items requiring official action, problems requiring resolution) must be documented in a form or report that, at a minimum, identifies the project, person contacted, method of monitoring, and summarizes the findings, recommendations, and proposed follow-up actions, including deadlines and assignment of responsibilities.
- b. All follow-up actions that cannot be resolved by the program office should be referred to the appropriate office for resolution. For example, if the program officer has been responsible for conducting the monitoring, any financial problems and issues of compliance requiring official action should be referred to the Grants Division or other offices, as appropriate. Requests for action must be made as soon as possible after making a determination of needed action. The program monitoring guidelines should explain procedures for referring and documenting such requests within Department offices.
- c. Each program and grants administration office should establish procedures for tracking and follow-up actions pursuant to monitoring. Periodic checks should be made to ensure follow-up action is occurring on schedule.

# 10 FAM 568 AND 569 UNASSIGNED